

Calfee, Halter & Griswold

88 East Broad Street
Suite 1500
Columbus, Ohio 43215
(614) 621-1500
Telecopier (614) 621-0010

Attorneys at Law
1800 Society Building
East Ninth & Superior
Cleveland, Ohio 44114-2688
(216) 622-8200

Cleveland
Telecopier (216) 241-0816



SDMS DocID 559615

April 2, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Steven J. Calder
Waste Management Division
U.S. Environmental Protection Agency
J.F. Kennedy Federal Building ASN-CAN5
Boston, MA 02203

Superfund Records Center
SITE: Coakley
BREAK: 11.9
OTHER: 559615

Re: Response of Gypsum Haulage, Inc.
to Notice of Potential Liability at
Coakley Landfill, New Hampshire

Dear Mr. Calder:

Gypsum Haulage, Inc., through its undersigned attorneys, submits the following response to the Notice of Potential Liability at Coakley Landfill, New Hampshire ("the Notice").

1. Gypsum Haulage, Inc. generated only solid waste and used crankcase oil during the time period referenced in the Notice. Prior to November 11, 1986, solid waste was removed from the Gypsum Haulage facilities at Griffin Road, Portsmouth, New Hampshire and Main Street, Salisbury, Massachusetts by the H.E. Bouffard Company. Used crankcase oil was removed and recycled during the relevant time period referenced in the Notice by Total Waste Management. From November 11, 1986 until the present, solid waste has been removed from these Gypsum Haulage facilities by Browning-Ferris Industries. Used crank case oil is currently removed and recycled by Total Waste Management.

After a diligent search of its corporate records, Gypsum Haulage has been unable to locate any documents concerning its waste handling or disposal practices or procedures for the relevant time period.

2. Gypsum Haulage, Inc. has no knowledge of any disposal of any industrial or liquid waste at the Site by any person before or after business hours.

3. H.E. Bouffard Company
P.O. Box 314
Kittery, Maine 03904

Calfee, Halter & Griswold

Browning-Ferris Industries
Corporate Office
Ashford Place
14701 St. Mary's Street
Houston Texas 77079

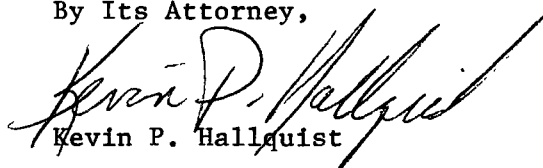
Total Waste Management
142 River Road
Newington, New Hampshire 03801

Based upon the information available to it, Gypsum Haulage does not believe it has any liability under the Comprehensive Environmental Response Compensation and Liability Act, 42 U.S.C. § 9601 et seq. or the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. or any other law for any response costs incurred as a result of environmental conditions at the Site. However, to the extent that U.S. EPA maintains that Gypsum Haulage has some liability for response costs incurred at the Site, Gypsum Haulage wishes to engage in negotiations directed toward resolution of its alleged liability.

The response provided above is true and correct to the best of Gypsum Haulage's belief.

Gypsum Haulage, Inc.

By Its Attorney,


Kevin P. Hallquist

KPH/krq
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